

Jeroen Walstra - 12/15/03

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

BRUCE ALLEN LILLER, et al

Plaintiffs

vs.

#MJG 02-CV-3390

ROBERT KAUFFMAN

Defendants and  
Third Party Plaintiffs

vs.

ROGER LEE HELBIG

Third Party Defendant

The telephonic deposition of JEROEN

WALSTRA was held on Monday, December 15, 2003,  
commencing at 2:00 p.m., at the Law Offices of Lord &  
Whip, 36 South Charles Street, 10th Floor, Baltimore,  
Maryland, 21201, before Paula J. Eliopoulos, Notary  
Public.

REPORTED BY: Paula J. Eliopoulos

EXHIBIT

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<p style="text-align: right;">6</p> <p>1 A And then I have a <del>certificate of Dutch in</del>  2 <del>Dutch law in economics from the University of</del>  3 <del>F-U-T-R-E-C-H-T, 1988.</del>  4 Q What caused you to go from studying  5 <del>physical education to economics?</del>  6 A My -- actually my degree is in marketing  7 Q Which degree is in marketing?  8 A The Master's Degree  9 Q I understand. Okay.  10 From Webster University?  11 A Correct.  12 Q So, you hold a Master's Degree in  13 marketing?  14 A Yes.  15 Q Other than the certificate which you hold  16 in Dutch law in economics --  17 A I did what they called <del>post Masters</del>  18 <del>credit at Melhurst (phonetic) College in 1997, which</del>  19 <del>related to vocational economic analysis and testimony.</del>  20 And I have a -- I'm a certified earnings  21 <del>analyst per July 18th, 2002, and that is through the</del></p>	<p style="text-align: right;">8</p> <p>1 with respect to economics?  2 A No, I don't.  3 Q Would you give me, please, your employment  4 history beginning with 1990?  5 A 1990? I started working for 3-M Health  6 <del>Care. That's what they call it. Marketing</del>  7 <del>coordinator for surgical products.</del>  8 At the same time, I was adjunct professor  9 <del>for Webster University in The Netherlands where they</del>  10 <del>had a campus and taught market forecasting.</del>  11 And then I continued to work for 3-M until  12 1994 in the Netherlands in Europe.  13 And then I moved to the United States in  14 19 -- end of 1994, Christmas, 1994, to work for 3-M  15 International Business Development. There I worked as  16 a -- worked in planning for exporters and 3-M  17 subsidiaries.  18 Then I moved to the Pittsburgh area after  19 quitting my job at 3-M and became self-employment.  20 because I was already involved in some of the similar  21 activities that we had in terms of forecasting</p>
<p style="text-align: right;">7</p> <p>1 professional association named AREA, and that's the  2 <del>American Rehabilitation Economics Association.</del>  3 Q And did you have to take an exam --  4 A Yes.  5 Q -- of some kind to obtain that  6 certification?  7 A Yes.  8 Q When did you take that exam?  9 A On July -- no. That must have been end of  10 May in 2002.  11 Q Is that a written exam?  12 A Yes. It's an eight-hour exam.  13 Q And is the examination administered by  14 the -- by AREA?  15 A Yes.  16 Q Did you pass that exam on your first  17 attempt?  18 A Yes.  19 Q Other than that certificate, which is a  20 certified earnings analyst, and your certificate in  21 Dutch law in economics, do you hold any other degrees</p>	<p style="text-align: right;">9</p> <p>1 earnings through an insurance company, actually, in  2 The Netherlands originally.  3 And with my business partner, Charles  4 <del>Cohen, I set up this consulting business, and we</del>  5 <del>started writing reports for attorneys in 1997</del>  6 <del>regarding losses of earnings in personal injury cases</del>  7 <del>and medical malpractice cases.</del>  8 Q So, did you leave 3-M in 1997?  9 A Actually I left in 1996. In the meantime,  10 I did also work with the United Marketing Group, which  11 is a consulting -- small consulting firm.  12 And I sometimes still do things for them  13 on a free-lance basis.  14 Q What kind of work do you do for them?  15 A It's consulting with small businesses  16 looking at market forecasting, sales development,  17 market share development, that kind of stuff, whatever  18 comes in as a job.  19 Q So, just for my own edification, for  20 example, if a company were interested in getting into  21 a different line of business, they might come to you</p>

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<p style="text-align: right;">42</p> <p>1 weeks for another and once a month for a third year.</p> <p>2 I did not include all the costs that he</p> <p>3 describes. <del>I did get a price for a neurological</del></p> <p>4 <del>assessment. I just look -- for Zoloft, I looked on</del></p> <p>5 <del>the Web site. I got a price from one of the people</del></p> <p>6 <del>that is doing that, a thousand dollars they charge for</del></p> <p>7 <del>that.</del></p> <p>8 And the follow-up treatment was based on</p> <p>9 twelve visits at \$80 a year -- \$80 per visit. So,</p> <p>10 that's basically for one year, and I discounted it</p> <p>11 over three years.</p> <p>12 So, I think that the amount would be</p> <p>13 higher than the amount that I have here.</p> <p>14 Q Wow! I've got so many questions about</p> <p>15 that, I'm not sure where to start.</p> <p>16 <del>Do you know if any physician has</del></p> <p>17 <del>prescribed any of these treatments or services for</del></p> <p>18 <del>Michael Liller?</del></p> <p>19 A I do not know at this point. I do --</p> <p>20 psychotropic medication, for example, Zoloft. So, it</p> <p>21 could be a different kind of medication. And I base</p>	<p style="text-align: right;">44</p> <p>1 available?</p> <p>2 A That's right.</p> <p>3 Q Would you agree with me that within those</p> <p>4 classes of medications there are I guess what you</p> <p>5 might call brand name drugs and generic drugs?</p> <p>6 A Uh huh. Correct.</p> <p>7 Q Would you agree with me that generic</p> <p>8 medications would be cheaper?</p> <p>9 A That's correct.</p> <p>10 Q Did you check the price of the generic</p> <p>11 medication?</p> <p>12 A No, I did not.</p> <p>13 Q How did you determine the cost of a full</p> <p>14 neuropsychological assessment?</p> <p>15 <del>A We had a quote here from a</del></p> <p>16 <del>neuropsychological psychologist.</del></p> <p>17 <del>Q Who was that?</del></p> <p>18 <del>A I don't have it in front of me. I'm</del></p> <p>19 <del>sorry.</del></p> <p>20 Q Would you agree with me that different</p> <p>21 neuropsychologists might charge different sums for an</p>
<p style="text-align: right;">43</p> <p>1 this on Dr. Cohen's report that he needs that.</p> <p>2 Q I understand.</p> <p>3 You would agree with me, though, that</p> <p>4 Dr. Cohen is not an M.D.?</p> <p>5 A Right.</p> <p>6 Q And you would agree with me that an M.D.</p> <p>7 would have to prescribe Zoloft or any other</p> <p>8 psychotropic medication?</p> <p>9 A I don't know. I mean, you should discuss</p> <p>10 that with Dr. Cohen.</p> <p>11 Q Would you agree with me that because</p> <p>12 you've done obviously some research into what the cost</p> <p>13 of this treatment would be --</p> <p>14 A Yeah.</p> <p>15 Q -- would --</p> <p>16 A Yeah, I have this from the Web site called</p> <p>17 Popular Prescription Drugs-dot-COM.</p> <p>18 Q Would you agree with me that Zoloft is but</p> <p>19 one example of a number of different classes of --</p> <p>20 A That's right.</p> <p>21 Q -- psychotropic medications which would be</p>	<p style="text-align: right;">45</p> <p>1 assessment?</p> <p>2 A Could be.</p> <p>3 Q Do you think it would have been prudent to</p> <p>4 check the cost for such an assessment with more than</p> <p>5 one provider?</p> <p>6 A Sure. Yeah.</p> <p>7 Q And the follow-up treatment for three</p> <p>8 years which you've reduced to present value of \$609,</p> <p>9 is that the course of follow-up psychotherapy that</p> <p>10 you're referring to?</p> <p>11 A No. That -- let me see.</p> <p>12 Yeah. He needs psychotherapy and</p> <p>13 cognitive retraining once a week for a year, yes.</p> <p>14 Q What is the follow-up treatment for three</p> <p>15 years that you're referring to?</p> <p>16 A Well, I just -- what I did is I did that</p> <p>17 12 times 80 and discounted that to present value. And</p> <p>18 I do not have a price for the other expenses.</p> <p>19 So, therefore -- and the psychotropic</p> <p>20 medication is calculated over three years. So,</p> <p>21 therefore, this is, you know, three years.</p>

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